

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GLADSTONE A. DAINTY,

*

Plaintiff

*

v.

*

Civil Action No.: 16-cv-02755-TDC

WELLS FARGO BANK, N.A.

*

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Defendant

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* * * * *

MOTION TO DISMISS

Defendant, Wells Fargo Bank, N.A. (“Wells Fargo”), by its attorneys and pursuant to Rule 16(b)(6) of the Federal Rules of Civil Procedure, hereby moves to dismiss the Complaint filed by Plaintiff, Gladstone A. Dainty (“Plaintiff”). The grounds for the instant Motion are set forth in the Memorandum of Law filed herewith and incorporated by reference herein.

WHEREFORE, for the reasons stated herein, Wells Fargo respectfully requests that the Court dismiss Plaintiff’s Complaint with prejudice and order such other and further relief as may be appropriate.

Respectfully submitted,

/s/ Robert A. Scott

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*Attorney for Defendant Wells Fargo Bank,
N.A.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of September, 2016, a copy of the foregoing Motion to Dismiss and supporting Memorandum of Law were filed via the Court's ECF system and thereby served on all counsel of record.

/s/ Robert A. Scott
Robert A. Scott